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PROFESSIONAL RODEO COWBOYS ASSOCIATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANTHONY AMEEN, an Individual,

Plaintiff,

vs.

PROFESSIONAL RODEO
COWBOYS ASSOCIATION, INC., a
Colorado non-profit corporation, and
RURAL MEDIA GROUP, INC., d/b/a
THE COWBOY CHANNEL, a
Delaware corporation,

Defendants.

Case No. 2:22-cv-02004-APG-NJK

**ORDER
EXTENDING TIME FOR
DEFENDANT PROFESSIONAL
RODEO COWBOYS
ASSOCIATION TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

1 Plaintiff Anthony Ameen (hereinafter “Plaintiff”) and Defendant Professional
 2 Rodeo Cowboys Association (hereinafter “Defendant”) (collectively, the “Parties”),
 3 by and through their undersigned counsel, hereby stipulate and agree as follows:

4 **WHEREAS**, Plaintiff filed a Complaint in the District Court of Clark County
 5 Nevada in an action styled *Anthony Ameen v. Professional Rodeo Cowboys*
 6 *Association, Inc. et al.*, Case No. A-22-858529-C, on September 16, 2022
 7 (hereinafter the “State Court Action”);

8 **WHEREAS**, Plaintiff filed an Amended Complaint in the State Court Action
 9 on October 25, 2022;

10 **WHEREAS**, Plaintiff served Defendant with the Amended Complaint on
 11 November 1, 2022;

12 **WHEREAS**, the Parties agreed that Defendant’s deadline to respond to the
 13 Amended Complaint would be extended from November 22, 2022 to January 6,
 14 2023;

15 **WHEREAS**, Defendant Rural Media Group, Inc. (hereinafter “RMG”)
 16 removed the State Court Action to this Court on November 30, 2022;

17 **WHEREAS**, Defendant has been actively engaged in discussions regarding
 18 applicable indemnification agreements and the appointment of defense counsel by
 19 the indemnifying party or an insurer;

20 **WHEREAS**, the deadline for Defendant to file a special motion to dismiss
 21 under Nevada’s anti-SLAPP statute is January 2, 2023. *See* NRS 41.660(2) (anti-
 22 SLAPP motion is due within 60 days of service of the complaint);

23 **WHEREAS**, each of these deadlines can be extended by the Court upon good
 24 cause. *See* Fed. R. Civ. P. 6(b)(1); NRS 41.660(2);

25 **WHEREAS**, Plaintiff has agreed to a further 14-day extension of time for
 26 Defendant to respond to the Amended Complaint, through and including January 20,
 27 2023, to provide additional time for Defendant to investigate Plaintiff’s allegations,
 28 prepare a response, and explore the possibility of resolving Plaintiff’s claims;

1 **WHEREAS**, this is the first request for an extension to this Court, and it is
2 made in good faith and not for purposes of delay;

3 **NOW, THEREFORE**, the parties hereby stipulate that Defendant's deadline
4 to file a response to Plaintiff's Amended Complaint shall be extended to, and
5 includes, January 20, 2023.

6
7 **IT IS SO STIPULATED.**

8
9 By: /s/ Amtoj S. Randhawa
Amtoj Randhawa
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13 *Attorneys for Defendant,*
14 *Professional Rodeo Cowboys*
Association

By: /s/David G. Bray
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Attorneys for Plaintiff,
Anthony Ameen

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21 **ORDER**

22 Having read the Parties' foregoing Stipulation, **IT IS HEREBY ORDERED**
23 that Defendant Professional Rodeo Cowboys Association's response to Plaintiff's
24 Amended Complaint shall now be due on or before **January 20, 2023**.

25
26 Dated: December 28, 2022

27 
28 Hon. Nancy J. Koppe
United States Magistrate Judge